

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TENNESSEE  
EASTERN DIVISION**

**IN RE:  
MARILYN WILLIAMS**

**DEBTOR**

**CASE NUMBER 09-11490-H  
CHAPTER 13**

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**EXPEDITED MOTION FILED BY DEBTOR(S) TO IMPOSE  
STAY UNDER SECTION 362(c)(4) AS TO ALL CREDITORS**

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Comes now the Debtor(s), by and through her attorney of record, C. Jerome Teel, Jr., and represents to the Court the following:

1. That the Debtor(s) had two or more prior pending case dismissed within the last year because: Case number 07-12553 (filed 8/15/07 dismissed 8/11/08) debtor's case was dismissed for failure to pay. Case number 08-13495 (filed 9/17/08 dismissed 2/25/09) was dismissed for failure to pay.
2. That the Debtor(s) financial or personal affairs have substantially changed since the dismissal of the prior case and the Debtor feels that he/she can fund and fully perform his/her plan because: Debtor has a lower plan payment and can make her payments now.
3. That the Debtor(s) prior Chapter 13 case was not dismissed because the Debtor(s) failed to provide adequate protection ordered by the Court or after the Debtor(s) failed to file or amend the petition or other documents as required by the Bankruptcy Code or the Court without substantial excuse.
4. The Debtor(s) prior Chapter 13 Case was not dismissed while an action under section 362(d) of the Bankruptcy Code was pending or after such an action had been resolved with an order terminating, conditioning or limiting the stay.
5. That this petition was filed in good faith as to the creditors to be stayed and the Debtor believes he/she can fully perform the terms of the proposed plan should it be confirmed by this Honorable Court.

Wherefore, premises considered, your Debtor(s) moves this Court under section 362(c)(4) to impose the automatic stay under section 362(a) as to all creditors for the duration of this Chapter 13 case or until such time as the stay is terminated, modified or annulled under section 362(d) of the Bankruptcy Code or further order of this Court.

Respectfully submitted this 14th day of April 2009

**Teel, McCormack, & Maroney PLC**  
**/s/ C. Jerome Teel, Jr.**  
**C. Jerome Teel, Jr. (016310)**  
**425 E. Baltimore St.**  
**Jackson TN 38301**  
**Phone: (731) 424-3315**  
**Fax: (731) 427-6981**

**CERTIFICATION OF DEBTOR(S)**

**I/We, declare under penalty of perjury that I/We have read this statements contained in the foregoing motion and that they are true and correct to the best of my/our knowledge.**

**/s/Marilyn Williams**  
**Debtor**  
**Date: 4/14/09**

**/s/\_\_\_\_\_**  
**Debtor**  
**Date: \_\_\_\_**

**CERTIFICATE OF SERVICE**

**I C. Jerome Teel, Jr., Counsel for the Debtor, do hereby certify that a copy of the foregoing Expedited Motion to Impose Automatic Stay Under Section 362(c)(4) as to All Creditors, has been mailed to: Chapter 13 Trustee, Timothy Ivy, P O Box 1313, Jackson, TN 38302, Marilyn Williams, 926 Locust Dr., Brownsville, TN 38012 and all Creditors per Matrix on April 14, 2009**

**/s/ C. Jerome Teel, Jr.**  
**C. Jerome Teel, Jr. 016310**